# TRADE ADJUSTMENT ASSISTANCE
# COMMUNITY COLLEGE AND
# CAREER TRAINING (TAACCCT) GRANT PROGRAM ROUND 4 SGA

## FREQUENTLY ASKED QUESTIONS

### NEW QUESTIONS (UPDATED APRIL 28, 2014):

Q**:**  How can applicants find out about industry-recognized credentials that already exist?

A:  There are a number of sources for identifying existing industry-recognized credentials.  For example, applicants can find information about existing credentials in the CareerOneStop Certification Finder tool (http://www.careeronestop.org/EducationTraining/Find/certification-finder.aspx), which can be searched by occupation, by industry, and by keyword.  The tool has thousands of certifications in it.  Applicants may also work with the employers and associations with whom they are partnering to identify the specific credentials which organizations seek from their workforce.

Q**:**  Is it allowable to use TAACCCT funds to pay industry associations or other organizations for the fees or licensing costs of offering industry-recognized credentials?

A:  TAACCCT funds may be used to expand and/or improve the capacity of institutions to offer credentials.  This could include the cost to the institution of leasing or renting space for use as a testing center, the cost of proctor salaries, and institutional fees or licensing costs needed to offer a credential examination to TAACCCT participants.

### NEW FEATURES OF THE TAACCCT ROUND 4 COMPETITION

Q**:**  What are some of the new features of the FY 2014 grant competition?

A:  Notable innovations from TAACCCT Round 4 include:

1.  Options for Additional Funding: Applicants can apply for additional funding beyond the set award ceilings to take successful approaches to scale and to drive policy changes that will lead to changes within institutions, state community college systems, or across all community colleges in states where centralized systems do not exist to improve the delivery of needed training for TAA-eligible workers and other adults.  The options or "cap breakers" for statewide capacity building activities focus on (1) advancing state career pathways; (2) improving statewide data integration, sharing and use; and (3) creating nationally recognized competencies and credentials that will result in new and improved credentials that are critical to regional economies, and can be shared nationally.

2.  Role of the Workforce System: While the workforce system has been an important partner throughout all three rounds of TAACCCT, there is increased emphasis on this collaboration in this solicitation.  The Department requires applicants to demonstrate a partnership with the workforce system to help support the implementation of the grant project.  Points in the selection criteria will be awarded to those community college and other higher education institution applicants that demonstrate a strong level of collaboration with these entities in a variety of forms, including evidence of a contract with a workforce investment board or

American Job Center to provide services and activities tailored to the project that are not already funded by other grants.

3. <u>Registered Apprenticeship</u>: As part of a core element on Sector Strategies and Employer Engagement, applicants are encouraged to partner with Registered Apprenticeship Sponsors in their local and regional areas, particularly in industry sectors and occupations with expected skill shortages. Round 4 also affords the opportunity for grant applicants to apply for additional grant funds through proposing to incorporate Registered Apprenticeship within the state career pathway system as part of option 1.

4. <u>Sector Strategies and Employer Engagement</u>: In Round 4, applicants will consider the needs of not only a few employers, but design programs that meet the needs of multiple employers within an industry sector. Employers, regional industry representatives, and national industry representatives (as applicable) will be integral to the project by serving on the project's leadership team and during implementation, working with institutions to identify and map the necessary skills and competencies for employment in that sector and assisting to design curricula and programs, assessments, or credentials that will allow program participants to obtain employment in that sector.

Q: The Solicitation states that "National multi-state consortia comprised of community colleges that do not share a common labor market or regional industry sector are not eligible to apply under this Solicitation." Why are these multi-state consortia not eligible under this Solicitation?

A: With this final round of TAACCCT funding, the Department is focused on advancing innovative, sector-based, system change in regional and statewide economies. TAACCCT Round 4 grant projects will create industry-driven strategies that are responsive to regional labor markets and state economies. Institutions within a single-state or regional consortium are best positioned to accomplish this by establishing relationships across state institutions or within a local region to address the needs of a local or regional economy.

In addition, this final round of funding seeks to take successful, evidence-based, approaches to scale and drive the policy changes that will lead to changes within institutions, state community college systems, or across all community colleges in states where centralized systems do not exist. TAACCCT Round 4 applicants will align policy across institutions to bring institutional changes to scale, through the development of statewide systems of sector-focused career pathways, contextualizing and accelerating remedial education, adopting innovative approaches to accelerate credit accumulation and postsecondary credential attainment, and improving data collection, integration and use across state community college systems.

The eligible applicant types for this SGA were designed with these goals in mind.

Q: What is the closing date for receipt of applications for the TAACCCT Round 4 competition for single institution applicants and consortium applicants?

A: In the TAACCCT Round 4, both single institution and consortium applicants will share the same application closing date. The SGA in Section IV.C indicates that for both single institution and consortium applicants, "the closing date for receipt of applications under this announcement is <u>July 7, 2014</u>." Please note further instructions on submitting an application in Section IV.C.

Q: Will sequestration impact the TAACCCT Round 4 competition?

A: As a result of sequestration, the total amount of funding available in the FY 2014 TAACCCT competition has been reduced by 7 percent, compared with funding in the FY 2011 and FY 2012

competitions.  In FY 2014, approximately $464 million will be available.  In addition, the Consolidated Appropriations Act of 2014 (Pub. L. 113-76) authorizes the expenditure of grant funds by the Department for evaluation and technical assistance. As a result, approximately $450 million in total funds will be available.  In order to meet the legislative requirement that all States receive 0.5 percent of the total available funds, eligible institutions in each State will receive award(s), either as a single institution or as a member of a consortium, of not less than $2,250,400.

## ELIGIBILITY

### *Eligible Applicants*
Q:  Are community colleges the only entities eligible to apply for TAACCCT grants?
A:  No.  As stated in Section III.A. of the SGA, "Eligible institutions are institutions of higher education as defined in Section 102 of the Higher Education Act of 1965 (20 U.S.C. 1002) which offer programs that can be completed in not more than two years.  They include public, proprietary, or other nonprofit educational institutions.  Generally, such institutions of higher education include two-year and four-year colleges and universities, Historically Black Colleges and Universities, Tribally Controlled Colleges and Universities, Hispanic-serving Institutions, and Asian American and Native American Pacific Islander-serving Institutions." Eligible institutions must be accredited, as of the closing date of the SGA, by a nationally recognized accrediting agency or association that has been recognized by the U.S. Department of Education.

Q:  Are community college districts or system offices eligible institutions?  Can they be the Lead Institution?
A:  No.  Community college districts or systems are not eligible applicants and cannot be the Lead Institution for a consortium application.  Eligible applicants are institutions of higher education that offer programs that can be completed in not more than two years and are accredited by an agency or association recognized by the U.S. Department of Education.  Eligible institutions must be accredited, as of the closing date of this SGA, by a nationally recognized accrediting agency or association that has been recognized by the U.S. Department of Education and submit documentation as an attachment verifying their status (and the status of each consortium member, if applying as a consortium) as an institution of higher education that is accredited by an agency that has been recognized by the U.S. Department of Education.

Q:  Are eligible institutions in U.S. territories eligible to apply for TAACCCT grants?
A:  Yes.  Educational institutions in the U.S. territories are eligible if they offer programs that can be completed in not more than two years and are accredited by an agency or association recognized by the U.S. Department of Education.  However, applications from institutions not located in the 50 States, the District of Columbia, and Puerto Rico may not be eligible for the full 10 points in Section V.A.1 of the SGA because 1 because workers outside of these jurisdictions cannot be certified as TAA-eligible.

### *Consortium Membership and Eligibility*
Q: Could an eligible institution that belongs to a system of colleges apply as the lead of a consortium that includes members of the same college system?
A: Yes.  If the individual colleges meet the eligibility requirements in Section III.A of the SGA, then 3 or more of those eligible colleges could apply as a consortium.  One of those colleges must be the Lead Institution of the consortium, which has overall fiscal and administrative responsibility for the grant.

Q: May an eligible institution be a Lead Institution of one consortium application and also be a Member Institution (non-Lead Institution) of another consortium application?

A: Yes. As stated in Section III.D of the SGA, "Eligible institutions may submit one application in response to this SGA, either as a single institution applicant or as the Lead Institution in a consortium application. However, eligible institutions may submit an application as a single institution applicant, and also serve as a member of a consortium in one or more consortium applications in which they do not serve as the Lead Institution."

Q: May an eligible institution apply as the Lead Institution for both a single institution application and a consortium application?

A: No. An eligible institution cannot submit more than one application to be a Lead Institution for a TAACCCT Round 4 grant. As stated in Section III.D.2 of the SGA, "Eligible institutions may submit one application in response to this SGA, either as a single institution applicant or as the Lead Institution in a consortium application."

Q: May an eligible institution apply to be a Member Institution (non-Lead Institution) of more than one consortium application?

A: Yes. As stated in Section III.D of the solicitation, eligible institutions may submit an application to "serve as a member of a consortium in one or more consortium applications in which they do not serve as the Lead Institution."


### Eligibility of Previous TAACCCT Grantees

Q: Are institutions funded under the FY 2011 (Round 1) and FY 2012 (Round 2) TAACCCT grants eligible to apply?

A: Yes. As stated in Section III. A of the solicitation, "Eligible institutions previously funded under TAACCCT SGA/DFY PY 10-03 (Round 1) and TAACCCT SGA/DFY PY 11-08 (Round 2) may apply as a single institution or as a Lead or Member Institution in a consortium application under this SGA." Applicants should note that, for institutions funded under TAACCCT Rounds 1 and 2, the Department does not intend that awards made through this solicitation will fund the continuation of their existing TAACCCT projects. However, TAACCCT Rounds 1 and 2 grantees and other eligible applicants can propose projects that expand or enhance previously-funded TAACCCT projects in a new way, such as: enhancing a classroom-based program of study for online or hybrid delivery; adding stackable education and/or training credentials to an existing program of study; and enhancing a program of study to be delivered in an accelerated format. For applicants that propose projects that expand or enhance previously-funded TAACCCT projects in a new way, a brief but detailed description of the expansion or enhancement of the activities of these projects must be included as part of the project description section of the abstract submitted with the application.

Q: Are institutions funded under the FY 2013 (Round 3) TAACCCT grants eligible to apply?

A: Eligible institutions previously funded as a single institution or a Lead Institution under a consortium application under TAACCCT SGA/DFY PY 12-10 (Round 3) may not apply as a Lead Institution in a consortium application under this SGA, but may apply as a single institution or participate in a consortium application as a Member Institution.

In addition, please note that eligible institutions previously funded as Member Institution under TAACCCT SGA/DFY PY 12-10 (Round 3) may apply as a Lead Institution of a single institution under this SGA.

Applicants should note that, for institutions funded under TAACCCT Round 3, the Department does not intend that awards made through this solicitation will fund the continuation of their existing TAACCCT projects. However, TAACCCT Rounds 3 grantees and other eligible applicants can propose projects that expand or enhance previously-funded TAACCCT projects in a new way, such as: enhancing a classroom-based program of study for online or hybrid delivery; adding stackable education and/or training credentials to an existing program of study; and enhancing a program of study to be delivered in an accelerated format. For applicants that propose projects that expand or enhance previously-funded TAACCCT projects in a new way, a brief but detailed description of the expansion or enhancement of the activities of these projects must be included as part of the project description section of the abstract submitted with the application.

## ROLES, ALLOWABLE ACTIVITIES AND COSTS

Q: Can employers, industry representatives, workforce system entities, and other potential partners be involved in more than one grant application?

A: Yes. Employers, industry representatives, workforce system entities, and other potential partners may be involved in more than one grant application. These potential partners may provide services as described in the solicitation in Section IV through leveraged and contract services, as appropriate.

Q: What role must employers and industry representatives play in the TAACCCT project?

A: Employers and industry representatives must:
- Serve on the project's leadership team;
- Help implement program strategies and goals;
- Identify and map the necessary skills and competencies for the program;
- Assist with development of national industry-recognized credentials if needed and appropriate, that map to curriculum development and courses, as applicable; and
- Assist with curriculum development, program design, and subsequent implementation of program design.

Examples of some additional roles of employers and industry representatives include providing work-based training opportunities for program participants (such as registered apprenticeships, internships, and on-the-job training), providing leveraged resources to support education/training (such as equipment, facilities, and, instructors), and committing to hire, promote, and/or retain qualified program participants.

Q: How may TAACCCT grant funds be used to pay public workforce system entities for services provided?

A: According to Section III.B of the solicitation, "It is allowable to contract with WIBs, and their American Job Centers (AJC) for the provision of dedicated services directly related to the TAACCCT-funded project, including costs related to implementing data sharing agreements. Applicants should refer to Section VI of the SGA for a list of relevant Office of Management and Budget (OMB) Circulars related to cost principles, administrative, and other requirements that apply to this Solicitation." Any activities and services provided through contracts with WIBs or located at an AJC must be dedicated resources to the TAACCCT program and not already funded through other Federal funding programs. Examples of activities that the public workforce system may be funded through contracts to perform can be found at Sec. I.B.4 of the SGA.

*Allowable Subgrants and Partner Activities and Costs*

Q:  Does the Subgrant Authority provided by the Consolidated Appropriations Act of 2014 (Public Law No: 113-76), extend to employers, industry organizations, workforce system entities, or other potential partners in a TAACCCT Round 4 application?

A:  No.  As provided by the Consolidated Appropriations Act of 2014 (Public Law No: 113-76), TAACCCT Round 4 grantees have authority to award subgrants only to other eligible institutions.  As stated in the SGA in Section IV.E.6, "Subgrants may not be made to other entities (public or private), including WIBS and employers."  However, grantees do have the authority to award contracts under this program to other entities that are not eligible for a subgrant.  A grantee enters into a subcontract to procure goods and/or services that are ancillary or supportive to the grantee's operation of the project."  Additional information on whether a relationship is a subgrant or a subcontract, please refer to SGA Section IV.E.6, "Limitations on Use of Funds for Sub-grants", Appendix N, and the definitions of subrecipient and vendor provided in OMB Circular A-133.

Q:  What are some examples of activities in which required partners could be engaged through a subcontract?

A:  As stated in the solicitation in Section IV.E.6, "A grantee enters into a subcontract to procure goods and/or services that are ancillary or supportive to the grantee's operation of the project.  A subcontract is defined as an agreement, purchase order, or any legal instrument issued to a third party (the subcontractor) calling for the performance of a defined piece of work or production and/or delivery of specified goods and services.  The determination of whether a grantee has entered into a vendor relationship or a subrecipient relationship with another entity is determined primarily with reference to the general purpose, programmatic functions, and responsibilities that the grantee gives to the other organization along with grant funds.  These three elements should be closely examined, together with the usual characteristics (terms and performance standards, scope of work, etc.)."

### Unallowable Activities and Costs

Q:  What are some examples of activities that cannot be funded using the TAACCCT grant?

A:  As stated in Section IV.E.1 of the solicitation, "Unallowable activities include the use of grant funds to pay an individual student's education and training costs, such as the cost of tuition (including scholarships), books, and academic fees.  Unallowable academic fees include the testing and licensure fees required for individual students to receive an industry-recognized credential.  Other unallowable activities include incentive payments for participants such as performance-based cash bonuses; WIA supportive services; wages of participants (including the wages of students participating in co-operative education programs, Registered Apprenticeship, on-the-job training, work-based training, or internships) and stipends for wage replacement of participants; the purchase of real property; and construction."

## FUNDING

### Applications and Project Implementation

Q:  As two kinds of proposals will be funded (individual applications and consortia applications) will these come from two "pots" of funding or will all proposals be funded from the same source based on points alone?

A:  The Department intends to fund grants ranging from $2,260,000 to $2,500,000 to single institution applicants, totaling up to approximately $150 million across 50 states, the District of Columbia, and Puerto Rico, potentially funding more than one per state.  In addition, it intends

to make approximately 15 to 25 grant awards to consortia of eligible institutions, up to a total of approximately $300 million in grant awards to consortium applicants. Applicants may seek to exceed the funding cap, as described below.

Q: How long will funded grantees have to implement their projects?

A: As stated in Section II.B of the solicitation, "The period of performance is 48 months, with an anticipated start date of October 1, 2014. This performance period includes all necessary implementation and start-up activities. Applicants must plan to fully expend grant funds during the period of performance while ensuring full transparency and accountability for all expenditures. Awards made under this announcement are subject to the availability of Federal funds. All programs must be developed and offered within the first 36 months of the period of performance, with grant funds allocated for program development and delivery expended during that time. DOL expects that grantees will begin enrolling participants in education and training programs no later than 18 months after the date of grant award. The final 12 months of the period of performance is limited to gathering information and data for reporting outcome measures and completing the requirements for the third-party evaluation. During this timeframe grantees cannot incur costs for any other activities, including program development and instructor salaries."

Please note that for applicants receiving funding in excess of the funding cap, in order to improve statewide data integration and use (Option 2, Section II.A), it is allowable to use grant funds to implement these additional activities for the entire 48 month period of performance.

Q. Will DOL fund projects that are similar or the same as those funded under the FY 2011, FY 2012, or FY 2013 grants?

A: As stated in Section IV.B.3 of the solicitation, "Applicants must provide a plan to reach out to grantees from Round 1, 2, or 3 to coordinate efforts, minimize duplication, share information, and expand the geographical reach of their program." This could include sharing information, lessons learned, and program content; sharing technological innovations; developing transferability and articulation agreements; and working together to standardize credentials. By reducing duplication, applicants will be making the best use of TAACCCT funds. In addition, applicants should note that the Department does not intend to fund the continuation of previously-funded TAACCCT projects.

### *Funding – Single Institution Applications*

Q: The SGA states that, "The Department intends to make grant awards to eligible single institution applicants ranging from approximately $2,260,000 to $2,500,000, up to a total of approximately $150 million." Are the funding figures per year of the project?

A: No, the funding amount for each grant is not per year. It is for the entire period of performance, which is up to 48 months (including the 12-month evaluation and data collection period).

Q: The SGA states that single institution applicants may apply to exceed the funding cap. What is the maximum amount that a single institution applicant may request?

A: As stated in Section II.A.3 of the SGA, "Single institution applicants may apply to exceed the maximum funding level of $2,500,000 by proposing a project that addresses regional capacity building activities, as discussed in Option 3, Create Nationally Recognized Competencies and Credentials, as described below. Single institution applicants proposing this option may seek up to an additional $750,000, for a total grant award of $3,250,000."

Q: What strategies must single institution applicants propose in order to apply for the additional $750,000 in grant funds?

A: As an addition to the strategy(-ies) proposed in their grant application, single institution applicants applying to exceed the funding gap must propose an additional strategy to create nationally-recognized competencies and credentials (Section II.A.6, Option 3). More information about the additional activities required to fully address this strategy can be found in Section II.A.6 of the solicitation; a description of the additional application submission requirements can be found in Section V.B.

Q: How will supplementary materials for applications requesting funds above the award amount ceiling be evaluated?

A: As stated in the solicitation, supplementary materials submitted by applicants requesting funds above the award amount ceiling will be evaluated by an expert review panel consisting of a mix of experts in education and training. This expert review panel is separate from the technical review panel that will evaluate and score all applications based on the evaluation criteria in Section V.A.

### *Funding – Consortium Applications*

Q: The SGA states that, "DOL intends to make approximately 15 to 25 grant awards to consortia of eligible institutions, up to a total of approximately $300 million in grant awards to consortium applicants. The Department will provide two tiers of funding for consortium grant awards, based on the number of institutions in the consortium." What are the tiers of consortium funding?

A: As stated in Section II.A.4 of the Solicitation, the Department will provide two tiers of funding for consortium applications.
   1. Tier 1 – these are small consortia comprised of three to 10 consortium members. The awards for consortia of this size will be capped at $10 million.
   2. Tier 2: These are medium to large consortia comprised of 11 or more consortium members. The award for consortia of this size will be capped at $15 million

Q: For Tier 1 consortia applicants, is the $10 million per year of the project?

A: No, the funding amount for each grant is not per year. It is for the entire period of performance, which is up to 48 months (including the 12-month evaluation and data collection period).

Q: For Tier 2 consortia applicants, is the $15 million per year of the project?

A: No, the funding amount for each grant is not per year. It is for the entire period of performance, which is up to 48 months (including the 12-month evaluation and data collection period).

Q: The SGA states that consortium applicants may apply to exceed the funding cap. What is the maximum amount that a single institution applicant may request?

A: As stated in Section II.A.5 of the solicitation, the maximum amount of funding that a consortium applicant seeking to exceed the cap may apply for is based on the number of members in the consortium:
   1. Tier 1 – Consortia with three to 10 members that meet the conditions in the SGA may request an additional level of funding of up to $2 million. The maximum award for consortium of this size is $12 million
   2. Tier 2: Consortia with 11 or more consortium members that meet the conditions in the SGA may request an additional level of funding of up to $5 million. The maximum award for consortium of this size is $20 million.

Q: What strategies must consortium institution applicants propose in order to apply for the grant funds that exceed the funding cap?

A: As stated in Section II.A.6 of the solicitation, "Consortium applicants may apply to exceed the maximum funding level for their tier by proposing to implement only one of the three types of regional or statewide capacity building activities:
1. Advance State Career Pathway Systems;
2. Improve Statewide Data Collection, Integration, and Use; or
3. Create Nationally Recognized Competencies and Credentials."

More information about the additional strategies required to fully address this strategy can be found in Section II.A.6 of the solicitation; a description of the additional application submission requirements can be found in Section V.B.

Q: How will supplementary materials for applications requesting funds above the award amount ceiling be evaluated?

A: As stated in the solicitation, supplementary materials submitted by applicants requesting funds above the award amount ceiling will be evaluated by an expert review panel consisting of a mix of experts in education and training.

## SERVING TAA-ELIGIBLE WORKERS

Q: What is the TAA for Workers Program?

A: The Trade Adjustment Assistance Program (referred to in this FAQ as the "TAA for Workers program") is a federal program that provides a path for employment growth and opportunity through aid to US workers who are in a group of workers that the Department has certified as trade-affected because foreign trade was an important cause of their actual or threatened job loss. The TAA for Workers program seeks to provide these trade-affected workers with opportunities to obtain the skills, resources, and support they need to become reemployed. The program provides benefits and services that are available to individual workers and are administered by the states through agreements between the Secretary of Labor and each state Governor. More information about the TAA for Workers program can be found at http://www.doleta.gov/tradeact.

Q: What types of programs would be suitable for TAA-funded training?

A: The TAA for Workers program pays for tuition and other costs for eligible workers in approved training programs. Typically, the TAA for Workers program helps workers to receive training in industries and occupations that can lead to high skilled, high wage jobs that can be found in one or more geographical areas. Applicants are encouraged to discuss detailed information about the training needs of TAA participants and approvable programs specific to their local area with State TAA Coordinators. A list of TAA representatives can be found at http://www.doleta.gov/tradeact/contacts.cfm. Applicants should note that the State agency that administers the TAA for workers program must be involved in the development and implementation of the grant project.

Q: Are there educational or training programs that states cannot approve for TAA-eligible workers?

A: According to the Department's regulations, a state may approve training for TAA-eligible workers in any program that would reasonably lead to employment of that worker with an employer following completion of the program, assuming that the other regulatory (and statutory) criteria for approval of training have been met for that individual: there is no

suitable employment available for the worker, the worker would benefit from appropriate training, the worker is qualified to undertake and complete such training, and such training is suitable for the worker and available at a reasonable cost that the TAA for Workers program will cover. Programs that are designed to lead solely to self-employment or employment as an independent contractor, for example, are not approvable. However, program participants are not prohibited from starting a new company provided that the credentials and certifications obtained could also lead to employment with an employer.

Q: How can my institution develop or offer entrepreneurship education or training programs that would be suitable for TAA-approved training?

A: Entrepreneurship as a strategy is broader in scope than a particular program resulting in a "Certificate of Entrepreneurship," or similar credential, or a particular employment outcome such as a start-up business, which would not be suitable for participants in the TAA for Workers program. The development of an entrepreneurship program should be done in consideration of a broader spectrum of possible career pathways. For example, a mixed "Financial Services and Entrepreneurship" program would be within the parameters required for TAA-eligible workers to be approved for this training and also provide participants the possibility of employment with an existing firm in the financial services sector.

Q: If my institution offers entrepreneurship education or training programs, would TAA-eligible workers be able to pay for that training with their benefits under the TAA for Workers program?

A: TAA-eligible workers who wish to receive TAA benefits are not prohibited from enrolling in an entrepreneurship program. Determinations of individual eligibility for the TAA for Workers program and approval of TAA-funded training will continue to be made by the relevant cooperating State agency in accordance with the requirements of Section 236(a)(1) of the Trade Act described above. Since any participant may choose to enroll in a TAACCCT-funded program (subject to that particular institution's enrollment criteria), any participant would be allowed to enroll in an entrepreneurship program, including TAA-eligible workers. However, if the entrepreneurship program does not meet the approval criteria for TAA-funded training for the individual participant, that TAA-eligible participant would have to seek alternate sources of funding for their enrollment in this course offered through the TAACCCT program.

Q: As a component of the entrepreneurship education and training program, we are proposing to assist program participants to start their own businesses. Are program participants in a TAACCCT funded entrepreneurship program allowed to start new businesses?

A: Program participants in any TAACCCT funded programs are not prohibited from starting a new company using non grant-funds. Applicants should note that programs offered or developed using TAACCCT funds should lead to credentials and certifications that could also lead to employment with an employer.

## PARTICIPANTS AND OUTCOMES

Q: Can TAACCCT grants serve workers who are not TAA-eligible workers?

A: As Section III.D.3 of the solicitation states, "There are no eligibility requirements for specific populations that are eligible to be served through the TAACCCT grants funded through this SGA. The intent of this SGA is to fund projects that expand and improve the ability of eligible institutions to provide education and training programs that are suitable for a diverse population of workers eligible for training under the TAA for Workers program, as well as a

broad range of other adults, such as women or minorities, who may be underrepresented in high-demand fields.  However, successful applicants must give priority of enrollment to workers eligible for training under the TAA for Workers program."

Q:  Do participants need to be tracked beyond the 36-month grant period?
A:  Yes.  The period of performance of the grants is 48 months, although all programs must be developed and offered and all funds spent on program development and delivery within the first 36 months of the grants.  During the final 12 months of the grant, successful applicants will be expected to track and report all outcome measures for all program participants and complete the requirements for the third-party evaluation for the project, including the submission of the final report, which is due at the end of that 12-month period.  These are the only allowable activities during the last 12 months of the grant.  Grantees are not expected to track participants after the period of performance ends.

## INTELLECTUAL PROPERTY RIGHTS

Q:  If a grantee purchases a ready-made solution from a vendor (such as an online training module), would this become part of the open source materials for this grant even if it was not developed with grant funds?
A:  Only work that is developed by the grantee with the grant funds is required to be licensed under the CC BY license.  Pre-existing copyrighted materials licensed to, or purchased by the grantee from third parties, including modifications of such materials, remains subject to the intellectual property rights the grantee receives under the terms of the particular license or purchase.  In addition, works created by the grantee without grant funds do not fall under the CCBY license requirement.